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**Environmental Ministries of Southern California**

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National Highway Traffic Safety Administration
Docket Management, Room PL-401,
400 Seventh Street, S.W.,
Washington, D.C., 20590

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Subj: Docket No. NHTSA-2001-11048, Light Truck Average Fuel Economy Standard, Model
Year 2004

Greetings:

We are writing to express our disappointment with the National Highway Traffic Safety Administration's decision to not increase the model year 2004 light truck average fuel economy standard in the subject rulemaking. We strongly urge you to reconsider your decision. Although detailed studies are required to increase fuel economy standards to the levels suggested possible by the National Research Council (NRC), we believe an immediate increase of one to two miles per gallon is fully justified without more detailed analysis.

We believe the recent NRC document "Technology and Economic Analysis in the Prepublication Version of the Report Effectiveness and Impact of Corporate Average Fuel Economy (CAFE) Standards: Letter Report" as well as common sense strongly support an immediate increase of one to two miles per gallon in fuel economy standards for light duty trucks. First the NRC study concludes "significant gains in fuel economy are possible with the application of new technology." Further, we believe the Ford Motor Company decision to offer for sale in 2003 a Escape SUV hybrid electric vehicle that is expected to nearly double the fuel economy of the Escape SUV clearly shows that improved fuel economies are clearly achievable at affordable prices. Similar technologies that could be immediately implemented into light duty trucks are currently available from Toyota and Honda. Even without application of advanced technologies auto makers would be able to accommodate a slightly higher fuel economy standard by reducing production of large low fuel economy trucks and increasing production of better performing vehicles.

By taking the small step of increasing fuel economy standards by even one mile per gallon, we believe the National Highway Traffic Safety Administration would be taking the first vital step toward reducing our Nation's dependence of foreign supplies. Although time is required to achieve a major fuel economy standard, a small immediate increase would provide much needed reductions in fuel consumption as well as air quality improvement.

If you have any questions, please feel free to contact us at 619/465-7951.

Sincerely,

Rev. Peter Moore Kochlacs